KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 ▪ FAX/377-7158

KA 450-96-04
February 23, 1998



Cindy L. Phillips, P.E.
Administrator, Title V Section
FDEP-Bureau of Air Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: KleenSoil International, Inc. (Mobile Soil Remediation Unit #1)
FESOP Application #7770029-002-AF
**Response to Request for Additional Information Dated July 24, 1996**

Dear Cindy Phillips:

This letter is in response to your Request for Additional Information dated July 24, 1996. All questions have been reproduced, preserving your order. The responses follow each question.

**1. On page 8 of the application, it is stated that "KleenSoil International, Inc. will curtail operations in order to escape Title V applicability." Please explain what is meant by "curtail operations".**

RESPONSE:

KleenSoil International, Inc. will limit the annual throughput rate of contaminated soil to 214,000 tpy in order to limit HAP emissions below 10 tpy for any single HAP and 25 tpy for total HAPs. Please refer to revised page 8 of the FESOP Application.

**2. On pages 9 and 16 of the application, the facility and emission unit SIC codes are listed as 1622 and 16, respectively. SIC code 1622 is for general contractors primarily engaged in the construction of bridges, tunnels, and elevated highways. Please explain why you chose this SIC code instead of SIC code 4953. SIC code 4953 is for establishments primarily engaged in the collection and disposal of refuse by processing or destruction or in the operation of incinerators, etc., and is consistent with the SCC you selected for the emission unit.**

RESPONSE:

Department of Environmental Protection staff suggested that we use SIC code 1622 for the mobile soil remediation unit. However, we concur that SIC code 4953 is more applicable. Please refer to revised pages 9, 18, & 79 of the FESOP Application.

**3. On page 13, the facility pollutant information is incomplete. All pollutants subject to a limitation at an emission unit need to be listed.**

RESPONSE:

Please refer to revised page 13 of the FESOP Application for the requested information.

**4. On page 14, the requested emissions cap (e.g., 7 TPY total HAPS) and related facility pollutant detail information were not provided. Please complete this section.**

RESPONSE:

The instructions for Section D. (Facility Pollutant Detail Information) state that a

> "multi-unit or facility-wide emissions cap occurs only when the group of emissions units or the facility as a whole is limited to an amount of emissions less than the sum of the potential emissions of the individual emissions units. For example, if two emissions units are each permitted to operate 8760 hours per year, but together are limited to 12,000 total hours of operation, the result is an emissions cap. Do not request, as a multi-unit or facility-wide emissions cap, any restriction on potential emissions that result directly from restrictions placed on the potential emissions of individual emissions units."

KleenSoil International, Inc. requests a Facility-Wide CAP for Total HAPS. Please refer to page 14 of the FESOP Application.

**5. On page 19, the emissions unit control equipment is described as a direct-flame afterburner. The correct control device or method code for a direct-flame afterburner is 021, but the code for a catalytic afterburner, 019, is listed instead. (019 is also listed on page 29.) Is the control equipment a direct-flame afterburner or a catalytic afterburner?**

RESPONSE:

The correct control device is a direct-flame afterburner. Please refer to revised pages 19 & 29 of the FESOP Application for the requested information.

**6. On page 20 there is no model number listed in the emission unit details. Is there a serial number or other type of number on the unit which can be used for**

**identification purposes? Since this is a mobile unit, a unique number would be helpful for a compliance inspector to positively identify the unit.**

RESPONSE:

The model # is CS6028 Drier. Please refer to revised page 20 of the FESOP Application for the requested information.

**7. On page 20, the dwell temperature and incinerator afterburner temperature are listed as 1500 °F. The currently permitted temperatures are 1600 °F. Please explain why the temperature is to be lowered, why there is no reported reduction in the control efficiency resulting from the lowered temperature at the same dwell time, and why the maximum heat input needs to remain the same.**

RESPONSE:

Rule 62-296.415(1)(a), F.A.C. requires that a soil thermal treatment facility shall be designed and operated to expose the organic vapors from the soil during thermal treatment to one of the following combinations:

| Minimum Temperature (F) | Minimum Time (Seconds) |
|---|---|
| 1,500 | 1.0 |
| 1,600 | 0.5 |
| 1,800 | 0.3 |

In order to comply with the above referenced requirement KleenSoil International will operate the afterburner at 1,600 F for a minimum retention time of 0.5 Seconds. Please refer to the calculation below:

Afterburner Velocity = 11,500 dscfm x (1600 F + 460 F)/(68 F + 460 F) / (1 - 0.25) / ($\pi$ x 25 $ft^2$ / 4) / 60 sec/min = 50.8 ft/sec

Retention Time = 32 ft (length of Afterburner) / 50.8 ft/sec = 0.63 sec > 0.5 sec

Please refer to revised page 20 of the FESOP Application for the requested information.

**8. On page 20, the maximum heat input rate of 1.86 MMBTU/hr to the generator is included with the maximum heat input rate of the kiln/afterburner emission unit. The diesel generator needs to be treated as a separate emission unit and the appropriate additional pages need to be submitted.**

RESPONSE:

Please refer to EU002 of the revised FESOP Application for the requested information.

**9. On page 20, please explain how you will determine the amount of soil that is decontaminated and how you will determine the VOC concentration in the soil. Also, what records will be kept by the owner for compliance assurance?**

RESPONSE:

Procedures in Rule 62-775.410, F.A.C. are followed to determine the amount of soil that is decontaminated. The VOC concentration in the soil is determined by comparing the difference in concentrations of the pretreated soil analyses with the postreated soil analyses. Please refer to Attachment 007 for additional information.

**10. On page 23, please explain why emission point type code "3" was selected. This would seem to be an emission point type "1". Does the generator have a separate exhaust? If so, a separate emission point information page needs to be completed for it.**

RESPONSE:

The generator and the mobile soil remediation unit are included in the revised FESOP Application as separate emissions units. EU001 & EU002 are both emission point type code "1". Please refer to revised pages 23 & 84 of the FESOP Application for the requested information.

**11. On page 24, please explain how the maximum dry standard flow rate can be calculated from the PM emission limit if, on page 30, the PM emission limit is calculated from the maximum dry standard flow rate.**

RESPONSE:

KleenSoil International, Inc. is requesting that the maximum dry standard flow rate be based on the maximum dry standard flow rate recorded during compliance testing. Please refer to Attachment 008 (Particulate Matter Emission Measurements-August 15, 1991) and revised page 24 of the FESOP Application.

**12. On page 26, please provide the maximum percent sulfur on a weight-percent basis to the nearest 0.1 percent (as required in the application form instructions.)**

RESPONSE:

The Gas Processors Association (GPA) provides product specifications for liquefied petroleum gases. Propane, as referenced in GPA Standard 2140-92, Figure 2-1, has a sulfur content of 185 ppmw.

AP-42 Version 5, Appendix A (A-5) states that the sulfur content in propane is negligible.

Please refer to Attachment 003 and revised page 26 of the FESOP Application for the requested information.

**13. On page 27, if the generator has a separate exhaust, the distillate oil usage for the generator needs to be subtracted and place on its own segment page.**

RESPONSE:

Please refer to EU002 of the revised FESOP Application for the requested information.

**14. On page 29, please recheck the primary control device codes. The code for PM and PM10 is listed as 018, but listed as 016 on page 18. The primary control device code for the VOC and HAPS is listed as 019, but should be 021 if it is a direct-flame afterburner. Since ethylbenzene (H085) is listed in the vapor profile for gasoline, it should also be included on the pollutant list. The HAPS pollutant regulatory code should be EL if you want to limit the HAP emissions.**

RESPONSE:

The correct primary control device code for PM is 016. Please refer to revised page 29 of the FESOP Application for the requested information.

The correct primary control device code for VOC and HAPs is 021. Please refer to revised page 29 of the FESOP Application for the requested information.

**15. Soils containing reformulated or oxygenated gasoline probably contain methyl tert butyl ether (MTBE). Please address this with listing on page 29 under emissions unit pollutants, if such soils are being decontaminated. If not, please confirm. The table you used for HAPS in gasoline contains representative amounts of HAPS in <u>normal</u> gasoline.**

RESPONSE:

Please refer to revised pages 40-71 of the FESOP Application for additional pollutant detail information pages.

**16. On page 30, the given reference for the emission factor of 0.04 gr/dscf is "process knowledge". Please elaborate. Isn't this just based upon the allowable emission limit in 62-296.415(3)?**

RESPONSE:

The given reference for the emission factor of 0.04 gr/dscf is based on the allowable emission limit in 62-296.415(3). Please refer to revised page 30 for the requested information.

**17. On page 30, in the calculation of kiln/afterburner PM emissions, please explain how the 21,583 dscfm was obtained. In the calculation of generator PM emissions, please explain how the 0.31 lb-PM/mmBtu emission factor was derived. (The generator should have its own "H. Emission Unit Pollutant Detail Information" pages.)**

RESPONSE:

The dry standard flow rate of 21,583 dscfm was based on the permitted hourly particulate matter rate of 7.4 lbs/hr and 0.04 grains/dscfm in Rule 62-296.415(3). However, based on recently reviewed compliance tests (August 15, 1991, May 21, 1991, and February 7, 1992) and the information below the correct flow rate should be 11,500 dscfm.

Please note that the original air construction permit application had a particulate matter calculation based on a grain loading standard of 0.08 grains/dscf (36,077 acfm at 1600 °F with no correction factor for moisture content). The issued air construction permit (AC16-187650) had a PM emissions limitation of 7.4 lbs/hr and 32.4 tpy which was based on the calculation in the application. When AC16-187650A was issued S.C. 11 was revised to reference the 0.04 grains/dscf in Rule 62-296.415(3), but the lbs/hr and tpy particulate matter emissions limitations were not changed.

Therefore, KleenSoil International, Inc. is requesting that the particulate matter allowable emissions limit be based on 0.04 grains/dscf in Rule 62-296.415(3) and the maximum dry standard flow rate recorded during compliance testing. Please refer to Attachment 008 (Particulate Matter Emission Measurements-August 15, 1991) and revised pages 30 & 31 of the FESOP Application.

Hourly: 0.04 gr/dscfm x 11,500 dscfm x 60 min/hr / 7000 gr/dscf = 3.94 lb/hr of PM
Annual: 3.94 lb/hr of PM x 8760 hrs/yr / 2000 lb/ton = 17.3 tpy of PM

**18. On page 31, please submit the requested allowable emissions and units (0.04 gr/dscf).**

RESPONSE:

Please refer to revised page 31 of the FESOP Application for the requested information.

**19. On page 32, please explain how the 0.95 lb CO/mmBtu emission factor was derived.**

RESPONSE:

The emission factor is based on AP-42 Version 5, Table 3.3-2. Please refer to EU002 in the revised FESOP application for the requested information.

**20. On page 33, please submit the requested allowable emissions and units (100 ppm).**

RESPONSE:

Please refer to revised page 33 of the FESOP Application for the requested information.

**21. On page 34, please explain how the 0.35 lb VOC/mmBtu emission factor was derived.**

RESPONSE:

The emission factor is based on AP-42 Version 5, Table 3.3-2. Please refer to EU002 in the revised FESOP application.

**22. Please submit Pollutant Detail Information pages for total HAPS, including metals.**

RESPONSE:

Please refer to revised pages 40-71 of the FESOP Application for additional pollutant detail information pages.

**23. On page 36, please explain how the 0.29 lb/$SO_2$/mmBtu emission factor was derived.**

RESPONSE:

The emission factor is based on AP-42 Version 5, Table 3.3-2. Please refer to EU002 in the revised FESOP application for the requested information.

**24. Please explain why the total of the drum/afterburner and generator emissions does not add up to the total potential emissions listed on page 36 and the total equivalent allowable emissions listed on page 37.**

RESPONSE:

Please refer to revised pages 36 & 37 of the FESOP Application for the requested information.

**25. On page 37, please submit the requested allowable emissions and units (0.3% by wt. avg. sulfur in fuel).**

RESPONSE:

Please refer to revised page 39 of the FESOP Application for the requested information.

**26. Please submit visible emissions information for the generator exhaust.**

RESPONSE:

Please refer to EU002 of the revised FESOP Application for the requested information.

**27. On page 39, please submit the CEM serial number and installation date.**

RESPONSE:

This information will be provided in a later submittal.

**28. Please explain where/how the fuel analysis in Attachment 003 was derived. Please submit an actual fuel analysis as an example.**

RESPONSE:

Fuel specifications were derived from AP-42 Version 5, Appendix A (A-5). Actual fuel analyses are not available for #2 fuel oil, since the unit has only fired propane. The data in Attachment 003 represents typical specifications for #2 fuel oil, propane, and natural gas.

Please refer to revised Attachment 003 of the FESOP Application for the requested information.

**29. Please submit a justification for why a waiver is requested for the description of stack sampling facilities. Describe the proposed capability to conduct stack sampling.**

RESPONSE:

A waiver was requested for Section L. Field 4 (Description of Stack Sampling Facilities) since the capabilities have not changed since the original submittal of the air construction permit application by DRE Environmental, Inc. on October 10, 1990.

The stack sampling facilities for EU001 satisfy requirements of Rule 62-297.310(6), F.A.C. and meet OSHA Standards described in 29 CFR 1910, Subparts D & E.

There are no applicable stack sampling requirements for EU002.

**30. Please submit the most recent stack sampling results as required in specific condition no. 19 of the current operating permit AO16-231440.**

RESPONSE:

KleenSoil International, Inc. has not operated the soil remediation unit in the State of Florida, and therefore no compliance stack sampling results are provided. However, upon obtaining a job in Florida, KleenSoil International, Inc. will conduct the required compliance testing and submit the stack sampling results to the Department as required in operating permit AO16-231440.

**31. Please revise the diagram in Attachment 001 to include the generator exhaust (if applicable.)**

RESPONSE:

Please refer to revised Attachment 001 of the FESOP Application for the requested information.

**32. Are all of the PM emissions assumed to be PM10?**

RESPONSE:

Yes, all of the PM emissions are assumed to be PM10.

If you have any questions, please feel free to contact me. Thank you for your consideration and assistance in renewing this permit.

Sincerely,

KOOGLER & ASSOCIATES

John B. Koogler, Ph.D., P.E.

# Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

FAX TRANSMITTAL SHEET

TO: MARK HAGGMAN, KOOGLER & ASSOC.

DATE: 6/26/96 PHONE: _____

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 8

FROM: CINDY PHILLIPS
DIVISION OF AIR RESOURCES MANAGEMENT

---

RE: KLEENSOIL UNIT #?

COMMENTS: THESE DOCUMENTS MAY HELP YOU DETERMINE WHICH UNIT YOU ARE TRYING TO PERMIT: MARCH 8, 1996 LETTER; FEB. 7, 1996 LETTER; JAN. 25, 1996 LETTER (WHICH INCLUDES TWO PERMIT TRANSFER APPLICATIONS); AND A 5/9/93 CERTIFICATE OF COMPLETION OF CONSTRUCTION FOR UNIT #1. (WE ALSO HAVE A TEST REPORT ON FILE) THE UNITS WERE ORIGINALLY ORE AND TRANSFERRED TO ANDERSON COLUMBIA BEFORE TRANSFERRED TO KLEENSOIL. GIVE ME A CALL IF YOU HAVE ANY QUESTIONS — OR ANSWERS.

PHONE: (904) 921-9534 FAX NUMBER: 904/922-6979

If there are any problems with this fax transmittal, please call the above phone number.

Will's

# Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

March 8, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. David A. Thomas, President
TranSoil Inc.
20711 U.S. Highway 98
Dade City, Florida 33525

Dear Mr. Thomas:

Re: Transfer of Permits
A016-231440 and AC16-189522B

The Department has reviewed your January 25 and February 7 letters requesting that Anderson Columbia Thermal Systems permit Nos. A016-231440 (Unit 1) and AC16-189522A (Unit 2) for mobile soil thermal treatment facilities be transferred to KleenSoil International, Incorporated and the expiration date of the permits be clarified. These requests are approved. The relocation notification requirements in Rule 62-210, F.A.C., are also being added to the permits. The reference permits are:

TRANSFERRED (A016-231440 and AC16-189522B):

From: Anderson Columbia Thermal Systems FORMERLY DRE
Post Office Box 1386
Lake City, Florida 32056-1386

To: KleenSoil International, Inc.
13838 Harlee Road
Palmetto, Florida 34221

KleenSoil is responsible for any future operation of these units.

EXPIRATION DATES:

July 15, 1998 for A016-231440 (Unit 1)
November 1, 1996, or 240 days after commencing operation, whichever occurs first, for AC16-189522B (Unit 2)

NEW SPECIFIC CONDITION (AO16-231440 and AC16-189522B):

At least 7 days prior to relocating the plant, the permittee shall notify the air program administrator for the Department's District and, if applicable, county air program administrator, of the next site in Florida where the unit will be operated at. The notification will be on DEP Form 62-210.900(3), F.A.C. The notification shall include the permit number of the facility, a copy of the last stack test results, the date of the proposed move, the new work site for the facility, the amount of contaminated soil at the new site, and the locations and contamination levels of the soils to be treated. Unless notified otherwise by an environmental agency, the unit may be relocated and operated at the new site. The Department will notify the permittee of any new restrictions for the facility that will apply while it is operating at the new site (Rule 62-775.700(1), F.A.C.).

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of their receipt of this intent. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

etc., etc...

KLEENSOIL INTERNATIONAL

"Setting the standard for Soil Treatment"

37557, 2222, 228082

February 7, 1996

Mr. Willard Hanks
Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Hanks:

Further to our recent conversation regarding the Mobile Treatment unit from Anderson Columbia.

We are enclosing a check for $500.00 and requesting that you re-issue the following Permits in the name of KleenSoil International Inc.

AC16-187650A
AC16-189522A
AO16-231440

It is my understanding that these permits will expire in February, 1977.

Sincerely

Trevor Cook
V.P. Operations

enc.

TC/lf

RECEIVED

FEB 13 1996

MAILROOM # 2

KleenSoil International, Inc., 13838 Harlee Road, Palmetto, Florida 34221 • 813/723-2700 • Fax 813/722-7743 • 1-800-962-9677

Fee?
Title V source?

**TRANSOIL INC**
*An Atlas Environmental Company*



January 25, 1996

20711 U.S. Highway 98
Dade City, FL 33525
(904) 583-3323

Operations/Marketing
Fax (904) 583-3393

Administration
Fax (904) 583-4478

*KleenSoil International, Inc.*
13838 Harlee Road
Palmetto, FL 33471
(813) 723-2700
Fax (813) 722-7743

*South Florida Thermal Services, Inc.*
1 Foxmoor Lane
P.O. Box 309
Moore Haven, FL 33471
(813) 946-3300
Fax (813) 946-3931

*Florida Specialized Carriers, Inc.*
20711 U.S. Highway 98
Dade City, FL 33525
(904) 583-3323
Fax (904) 583-4478

Certified Mail Number Z 781 654 898

Mr. Willard Hanks
Florida Department of Environmental Protection
Bureau of Air Regulation
Permitting & Standards Section
2600 Blairstone Road
Tallahassee, FL 32399-2400

Dear Mr. Hanks:

KleenSoil International, Inc. (KSI) has acquired the Mobile Thermal Treatment Unit that has been owned by Anderson Columbia Thermal Systems (ACTS).

As part of the transfer of ownership, I have enclosed two applications for transfer of permit. Since ACTS has two permits with FDEP, KSI acquired both permits as part of the purchase.

Please process the transfers as soon as you can and return the original permits to me. If you have any questions please call Trevor Cook, Vice President of Operations of KSI at 813-723-2700.

Sincerely,
KleenSoil International, Inc.

David A. Thomas

David A. Thomas, President

enc

cc: W. Hanks
J. Holtom

# Department of Environmental Protection

Lawton Chiles
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

Virginia B. Wetherell
Secretary

## APPLICATION FOR TRANSFER OF PERMIT

Permit No. AC-16-187650A Date Issued 1/01/95 Date Expires 1/01/96

### NOTIFICATION OF SALE OR LEGAL TRANSFER

Source Name: Anderson Columbia Thermal Systems County: Columbia

Source Location: 2 Guerdon Road City: Lake City

Permittee Name: John R. Fulkerson Title: Vice President

Mailing Address: P.O. Box 1386

Lake City, FL 32056-1386

The undersigned hereby notifies the department of the sale or legal transfer of this pollution source. He further agrees to assign his rights as permittee to the applicant in the event the department agrees to the transfer of permit.

Sworn to and subscribed before me at Columbia County, Lake City, Florida this 11TH day of January 19 96.

Signature of Permittee

Vice President
Title

Date: 1/11/96

Penny S. Faris
Notary Public

My Commission Expires: PENNY S. FARIS Notary Public, State of Florida My Comm. expires Dec. Comm. No.

### REQUEST FOR TRANSFER OF PERMIT

Source Name: KleenSoil International, Inc.

Applicant Name: David A. Thomas Title: President

Mailing Address: 20711 US Hwy 98

Dade City, FL 33525 Telephone: (904) 583-3323
area

Project Engineer: Name: Koogler & Associates Environmental Services

Mailing Address: 4014 NW 13th Street

Gainesville, FL 32609 Telephone: (904) 377-5822
area

The undersigned hereby notifies the department of his having acquired title to this pollution source. He further states that he has examined the application and documents submitted by the current permittee the basis on which Permit No. AC-16-187650A was issued by the department, and states that they accurately and completely describe the permitted activity or project. He further states that he is familiar with the permit, agrees to comply with its terms and conditions, and agrees to assume the rights and liabilities contained therein. He also agrees to promptly notify the department of any future change in ownership of, or responsibility for, the permitted activity or project.

Sworn to and subscribed before me at Pasco County, Dade City, FL this 25th day of January 19 96.

David A. Thomas
Signature of Applicant*

President
Title

Melba L. Kelly
Notary Public

Date: 1/25/96

My Commission Expires:

*Attach letter of authorization if other than owner or corporate officer.

MELBA L. KELLY
MY COMMISSION # CC 380303
EXPIRES: July 20, 1996
Bonded Thru Notary Public Underwriters

# Department of Environmental Protection

Lawton Chiles
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

Virginia B. Wetherell
Secretary

## APPLICATION FOR TRANSFER OF PERMIT

Permit No. AC-16-189522A Date Issued 1/01/95 Date Expires 1/01/96

### NOTIFICATION OF SALE OR LEGAL TRANSFER

Source Name: Anderson Columbia Thermal Systems County: Columbia

Source Location: 2 Guerdon Road City: Lake City

Permittee Name: John R. Fulkerson Title: Vice President

Mailing Address: P.O. Box 1386

Lake City, FL 32056-1386

The undersigned hereby notifies the department of the sale or legal transfer of this pollution source. He further agrees to assign his rights as permittee to the applicant in the event the department agrees to the transfer of permit.

Sworn to and subscribed before me at Columbia

County, Lake City, Florida

this 11th day of January 19 96.

Penny S. Faris
Notary Public

My Commission Expires:

PENNY S. FARIS
Notary Public, State of Florida
My Comm. expires Dec. 19, 1999
Comm. No. CC427765

Signature of Permittee

Vice President
Title

Date: 1/11/96

### REQUEST FOR TRANSFER OF PERMIT

Source Name: KleenSoil International, Inc.

Applicant Name: David A. Thomas Title: President

Mailing Address: 20711 US Hwy 98

Dade City, FL 33525 Telephone: (904) 583-3323
area

Project Engineer: Name: Koogler & Associates Environmental Services

Mailing Address: 4014 NW 13th Street

Gainesville, FL 32609 Telephone: (904) 377-5822
area

The undersigned hereby notifies the department of his having acquired title to this pollution source. He further states that he has examined the application and documents submitted by the current permittee the basis on which Permit No. AC-16-189522A was issued by the department, and states that they accurately and completely describe the permitted activity or project. He further states that he is familiar with the permit, agrees to comply with its terms and conditions, and agrees to assume the rights and liabilities contained therein. He also agrees to promptly notify the department of any future change in ownership of, or responsibility for, the permitted activity or project.

Sworn to and subscribed before me at Pasco

County, Dade City, FL

this 25th day of January 19 96.

Melba L. Kelly
Notary Public

My Commission Expires:

MELBA L. KELLY
MY COMMISSION # CC 380303
EXPIRES: July 20, 1996
Bonded Thru Notary Public Underwriters

David A. Thomas
Signature of Applicant*

President
Title

Date: 1/25/96

*Attach letter of authorization if other than owner or corporate officer.

$1,500 pd.
5-14-93
Recpt. # 180857

AO16-231440

RECEIVED
MAY 18 1993

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
Division of Air Resources Management

# AIR POLLUTION SOURCES
# CERTIFICATE OF COMPLETION OF CONSTRUCTION*

PERMIT NO. AC16-187650 DATE: May 9, 1993

Company Name: DRE Environmental, Inc. County: Portable

Source Identification(s): Soil Remediation Incinerator (Portable)

Actual costs of serving pollution control purpose: $ 350,000

Operating Rates: 35 tph Design Capacity: 35 tph

Expected Normal 30 tph During Compliance Test 20 tph

Date of Compliance Test: Feb. 25-26, 1993 (Attach detailed test report)

Test Results:

| Pollutant | Actual Discharge | Allowed Discharge |
|---|---|---|
| Particulate | .03566 grains/dscf | .04 grains/dscf |
| VOC | .10 lbs/hr | 22.8 lbs/hr |
| | | |

Date plant placed in operation: in Florida Feb 15, 1993

This is to certify that, with the exception of deviations noted**, the construction of the project has been completed in accordance with the application to construct and Construction Permit No. AC16-187650 dated _____.

A. Applicant:

Chris Sleeper, President
Name of Person Signing (Type)

Chris M. Sleeper
Signature of Owner or Authorized Representative and Title

Date: May 11, 1993 Telephone: (904) 758-3164

B. Professional Engineer:

Dole J. Kelley, Jr., P.E.
Name of Person Signing (Type)

Dole J. Kelley, Jr.
Signature of Professional Engineer

Dole J. Kelley, Consulting Engineer
Company Name

Florida Registration No. 6519

Date: 5-11-93

(Seal)

P.O. Box 10428 Jacksonville, FL. 32207
Mailing Address

(904) 731-7760
Telephone Number

*This form, satisfactorily completed, submitted in conjunction with an existing application to construct permit and payment of application processing fee will be accepted in lieu of an application to operate.

**As built, if not built as indicated include process flow sketch, plot plan sketch, and updates of applicable pages of application form.